# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 1:25-cv-22896-JEM

FRIENDS OF THE EVERGLADES, INC., a Florida not-for-profit corporation, and CENTER FOR BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit organization,

Plaintiffs,

VS.

KRISTI NOEM, in her official capacity as Secretary of the UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TODD LYONS, in his official capacity as Acting Director of the UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT; KEVIN GUTHRIE, in his official capacity as Executive Director of the Florida Division of Emergency Management; and MIAMI-DADE COUNTY, a political subdivision of the State of Florida,

Defendants.

## PLAINTIFFS' NOTICE OF SERVICE EFFORTS ON FEDERAL DEFENDANTS

Plaintiffs, through undersigned counsel, hereby give notice of the following efforts to provide notice to Defendants Kristi Noem, in her official capacity as Secretary of the United States Department Of Homeland Security and Todd Lyons, in his official capacity as Acting Director of the United States Immigration and Customs Enforcement of the filing of the Complaint for Declaratory and Injunctive Relief in this action (ECF No. 1, the "Complaint"), and Expedited Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 5, the "TRO Motion").

Immediately upon the filing of the Complaint, on Friday, June 27, 2025 at 12:03 P.M., Plaintiffs' counsel emailed the Complaint, along with the Summonses and Civil Cover Sheet to United States Attorney for the Southern District Hayden O'Byrne. A true copy of the June 27, 2025 at 12:03 P.M. email (excluding attachments) is attached hereto as Exhibit 1. At 2:25 P.M. on June 27, 2025, Plaintiffs' counsel emailed the TRO Motion and proposed order to United States Attorney for the Southern District O'Byrne. A true copy of the June 27, 2025 2:25 P.M. email (excluding attachments) is attached hereto as Exhibit 2. The same day, under Fed. R. Civ. P. 4(i), the Summonses, Complaint and TRO Motion were served via Certified Mail/Return Receipt Requested. See Composite Exhibit. 3. On June 30, 2025, courtesy copies of the Complaint and TRO Motion were hand-delivered to the United States Attorney's Office for the Southern District of Florida (Miami Division). A true copy of the correspondence (excluding enclosures) is attached hereto as Exhibit 4, and proof of delivery is attached as Exhibit 5.

Dated: June 30, 2025

Respectfully submitted,

**EARTHJUSTICE** 

4500 Biscayne Boulevard, Suite 201

Miami, Florida 33137

Telephone: (305) 440-5432

By: s/ Tania Galloni

Tania Galloni, Fla. Bar No. 619221

tgalloni@earthjustice.org

Dominique Burkhardt, Fla. Bar No. 100309

dburkhardt@earthjustice.org

Alisa Coe, Fla. Bar No. 10187

acoe@earthjustice.org

Counsel for Friends of Everglades

COFFEY BURLINGTON, P.L.

2601 South Bayshore Drive, Penthouse One

Miami, Florida 33133

Telephone: (305) 858-2900

By: s/ Paul J. Schwiep

Paul J. Schwiep, Fla. Bar No. 823244

PSchwiep@CoffeyBurlington.com

Scott Hiaasen, Fla. Bar No. 103318

SHiaasen@CoffeyBurlington.com

YVB@CoffeyBurlington.com

LPerez@CoffeyBurlington.com

service@CoffeyBurlington.com

Counsel for Plaintiffs

CENTER FOR BIOLOGICAL DIVERSITY

Elise Pautler Bennett, Fla. Bar No. 106573

ebennett@biologicaldiversity.org

Jason Alexander Totoiu, Fla. Bar No. 871931

jtotoiu@biologicaldiversity.org

Post Office Box 2155

St. Petersburg, FL 33731

Telephone: (727) 755-6950

Counsel for Center for Biological Diversity

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 30, 2024, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

## **Service List**

#### Nathan A. Forrester

Chief Deputy Solicitor General <a href="mathan.forrester@myfloridalegal.com">nathan.forrester@myfloridalegal.com</a>

## Robert S. Schenck

Assistant Solicitor General robert.schenck@myfloridalegal.com
Office of the Attorney General
The Capitol, PL-01
Tallahassee, Florida 32399-1050
Telephone: (850) 414-3300

jenna.hodges@myfloridalegal.com

Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management

BOIES SCHILLER FLEXNER LLP

Jesse Panuccio, Esq. ipanuccio@bsfllp.com

Evan Ezray, Esq. eezray@bsfllp.com

401 East Las Olas Boulevard, Suite 1200

Fort Lauderdale, Florida 33301 Telephone: (954) 356-0011

Counsel for Defendant Kevin Guthrie, in his official capacity as Executive Director of the Florida Division of Emergency Management

GERALDINE BONZON-KEENAN

Miami-Dade County Attorney

Christopher J. Wahl, Esq.

wahl@miamidade.gov

David M. Murry, Esq.

dmmurray@FlyMIA.com

Stephen P. Clark County

111 Northwest 1st Street, Suite 2810

Miami, Florida 33128

kgriffin@FlyMIA.com

victor.rodriguez3@miamidade.gov

Counsel for Miami-Dade County